

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., et al,

Plaintiffs,

v.

SURFSHARK LTD et al.,

Defendants.

Civil Action No. 1:21-cv-00643-RDA-IDD

**JOINT STIPULATION FOR DISMISSAL OF DEFENDANT ZENGUARD GMBH
WITHOUT PREJUDICE**

Plaintiffs MILLENNIUM FUNDING, INC., SCREEN MEDIA VENTURES, LLC, VOLTAGE HOLDINGS, LLC, MILLENNIUM MEDIA, INC., PARADOX STUDIOS, LLC, DALLAS BUYERS CLUB, LLC, WONDER ONE, LLC, FW PRODUCTIONS, LLC, MILLENNIUM IP, INC., I AM WRATH PRODUCTIONS, INC., FAMILY OF THE YEAR PRODUCTIONS, LLC, AMBI DISTRIBUTION CORP., KILLING LINK DISTRIBUTION, LLC, BADHOUSE STUDIOS, LLC, LF2 PRODUCTIONS, INC., LHF PRODUCTIONS, INC., LAUNDRY FILMS, INC., VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., SPEED KILLS PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., HITMAN 2 PRODUCTIONS, INC. and MORGAN CREEK PRODUCTIONS, INC. (“Plaintiffs”) and Defendant ZENGUARD GMBH (“ZenGuard”) (Plaintiffs and Defendant ZenGuard collectively, “Parties”), through their counsel, hereby file this joint stipulation for dismissal without prejudice.

The Parties agree that the present joint dismissal shall not be considered a previously dismissed action pursuant to Rules 41(a)(1)(B) of the *Federal Rules of Civil Procedure*.

Plaintiffs and Defendant ZenGuard do not seek an award of attorney's fees and/or costs.

This Stipulation has been executed by counsel for Plaintiffs and Defendant ZenGuard.

Note that this action does not terminate the matter as claims remain against other Defendants.

DATED: December 23, 2021

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Counsel for Defendant ZENGUARD GMBH

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2021, the foregoing was electronically filed and served on all counsel of through the Court's CM/ECF system, in accordance with the Court's electronic case filing policies and procedures:

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